# IN THE UNITED STATES DISTRICT COURT FOR THE STATE OF MASSACHUSETTS

	)		
DEBORAH KELLY,	)		
71.1.100	)		a
Plaintiff,	)		Case No: 05-10750-GAO
	)		
V.	)		
	)		
PAUL DONNELLY,	)		
MICHAEL BYERS,	)		
SGT. KEITH JACKSON,	)		
OFFICER JOHN DOE, in	)		
their individual and	)		
official capacities, and		)	
THE TOWN OF ROCKLAND,	)		
MASSACHUSETTS,	)		
	)		
Defendants.	)		
	)		

### PLAINTIFF'S REQUESTED ADDENDUM TO

### JOINT PRE-TRIAL MEMO

The plaintiff seeks to add two exhibits to the Joint Pre-Trial Memo. The additional exhibits are printing in italics, below. Under this request, the plaintiff's proposed exhibits would be amended to state:

### 11. The Proposed Exhibits

- (a) By the Plaintiff
  - 1. Numerous photographs of the scene of the events
  - 2. Photographs of black pick-up truck with broken window, flat tires
  - 3. Photograph of plaintiff's black eyes

- 4. Audiotape of arrest
- 5. Town of Rockland Assessor's Map
- 6. Town of Rockland Property Assessment Record
- 7. Photograph of truck without flat tires
- 8. *Photograph(s) of window and mirror of truck in normal condition.*

Respectfully Submitted,

/s Daniel S. Sharp
Daniel S. Sharp (BBO 565524)
Attorney for Plaintiff
48 Locust Street
Marblehead, MA 01945
781-639-1862

## **CERTIFICATE OF SERVICE**

The undersigned certifies that he/she caused a true copy of the document above to served by ECF on all counsel of record, and by in-hand service on May 10, 2006.

/s/ Dan Shar	<u>p</u>